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5 | Attorneys for Defendant  
MARIA ALICIA TORRES GUTIERREZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Case No.: 18-CR-0458-RS

Plaintiff,

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING STATUS  
CONFERENCE AND EXCLUDING  
TIME UNDER THE SPEEDY TRIAL  
ACT**

vs.

MARIA ALICIA TORRES GUTIERREZ,

## Defendants

18        This matter is presently set for a status conference on June 18, 2019. The government has  
19        produced discovery to the defendant, including wiretap recordings, pursuant to the terms of a protective  
20        order. Ms. Torres Gutierrez is currently on pretrial release and resides in the Central District of  
21        California. Ms. Gutierrez's counsel is still reviewing the discovery produced to date. In light of the  
22        pending review, the protective order's restrictions on the dissemination of that discovery, and the  
23        defendant's residence outside the district, the parties do not believe they will be in a position to provide  
24        the Court with a meaningful status update on the date currently set. For these reasons, the parties  
25        stipulate and respectfully request the Court continue the status conference from June 18, 2019 to July  
26        16, 2019 at 2:30 p.m.

27 For the same reasons, the parties also stipulate that the time between June 18, 2019 and July  
28 16, 2019, should be excluded from calculation under the Speedy Trial Act for the effective preparation

STIPULATION AND PROPOSED ORDER  
Case No.: 18-CR-0458-RS

1 of counsel and that ends of justice served by any such continuance outweigh the best interests of the  
2 public and the defendant in a speedy trial.

3 IT IS SO STIPULATED this 14<sup>th</sup> day of June, 2019.

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MOEEL LAW OFFICE

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/s/\_\_\_\_\_

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SHAFFY MOEEL

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Attorney for Maria Alicia Torres Gutierrez

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DAVID L. ANDERSON

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United States Attorney

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/s/\_\_\_\_\_

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NIKHIL BHAGAT

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Assistant United States Attorney

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Attorneys for the United States

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## **[PROPOSED] ORDER**

2 For good cause shown, with respect to defendant Maria Alicia Torres-Gutierrez, the status  
3 conference hearing presently set for June 18, 2019 at 2:30 p.m. is continued to July 16, 2019 at 2:30  
4 p.m. Based upon the stipulation of counsel and for good cause shown, the Court finds that failing to  
5 exclude the time between June 18, 2019, and July 16, 2019 would deny counsel the reasonable time  
6 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §  
7 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from  
8 June 18, 2019 through and including July 16, 2019, from computation under the Speedy Trial Act  
9 outweigh the best interests of the public and the defendants in a speedy trial. Having made these  
10 findings, it is hereby **ORDERED** that the time from June 18, 2019 through and including July 16,  
11 2019, shall be excluded from computation under the Speedy Trial Act as to this defendant. 18 U.S.C.  
12 § 3161(h)(7)(B)(iv).

PURSUANT TO STIPULATION, IT IS SO ORDERED this 17th day of June, 2019.

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THE HONORABLE RICHARD SEEBORG  
UNITED STATES DISTRICT JUDGE

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